

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION**

LARRY W. ASHWORTH,

Plaintiff,

v.

Civil Action No. 2:20-CV-00053

Judge James D. Cain, Jr.

KERR MCGEE CHEMICAL CORP, et al.,

Defendants.

CERTIFICATE PURSUANT TO LOCAL RULE 7.4.1

Undersigned counsel for plaintiff Larry W. Ashworth certifies that counsel for Larry W. Ashworth contacted counsel for defendant International Paper by email dated November 24, 2021 regarding plaintiff's proposal to obtain expedited depositions without court action, a copy of which is attached as **Exhibit E** to the accompanying declaration of David L. Wallace, dated January 21, 2022. Defendant International Paper advised that it "does not agree to waive the procedures and requirements of Rule 26 and objects to any depositions taking place prior to those being met."

This 24th day of January, 2022, Lake Charles, Louisiana.

By: 

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Larry W. Ashworth